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7 Attorneys for Plaintiffs

8 **UNITED STATES DISTRICT COURT**

9 **EASTERN DISTRICT OF CALIFORNIA – SACRAMENTO DIVISION**

11 LAGARION BROWN, ROY JACKSON,
YAPHETT SAUNDERS, ISAAC
12 SAUNDERS, HAKEEM ALLAMBIE, and
NICHLOM GARRETT, individually and on
13 behalf of those similarly situated,

14 Plaintiffs,

15
16 vs.

17 TETRA TECH, INC., JESCO
18 ENVIRONMENTAL AND
GEOTECHNICAL SERVICES, INC., and
19 DOES 1-20,

20 Defendants.
21

Case No.: 2:20-CV-01133-DJC-DMC

CLASS ACTION

**PLAINTIFFS' NOTICE OF MOTION
AND MOTION FOR FINAL APPROVAL
OF CLASS AND COLLECTIVE
ACTION SETTLEMENT**

Date: February 20, 2025

Time: 1:30 PM

Judge: Hon. Daniel J. Calabretta

Room: 10, 13th Floor

Complaint Filed: June 3, 2020

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23 **TO THE HONORABLE COURT AND ALL INTERESTED PARTIES AND THEIR**
24 **COUNSEL OF RECORD:**


25 PLEASE TAKE NOTICE THAT on February 20, 2025 at 1:30 PM, before the Honorable
26 Daniel J. Calabretta of the United States District Court, Eastern District of California, in courtroom
27 10, 13th floor, at 501 I Street, Sacramento, CA 95814, Plaintiffs Lagarion Brown, Roy Jackson,
28 Yaphett Saunders, Isaac Saunders, Hakeem Allambie, and Nichlon Garrett ("Plaintiffs") will, and

1 hereby do, move for an Order: (1) granting final approval of the class and collective action
2 settlement; (2) granting final certification of the settlement class; (3) awarding Class
3 Representative Enhancement Awards; (4) awarding attorneys' fees; (5) awarding reimbursement
4 of litigation costs; (6) approving payment of settlement administration expenses; (7) approving
5 LWDA payment; and (8) approving Plaintiffs' proposed *cy pres* recipient, Legal Aid at Work.

6 Plaintiffs bring this Motion on the grounds that, after arms-length negotiations, the parties
7 have reached a fair, reasonable, and adequate settlement that is within the range of final approval.
8 Moreover, after dissemination of notice to the class, there have been no objections, and only one
9 request for exclusion. Thus, the settlement should be granted final approval. This Motion is based
10 on this Notice and Motion, the supporting Memorandum of Points and Authorities, the Declaration
11 of Stan Mallison, including attached exhibits, the record on file herein, and any other evidence and
12 oral argument that may be presented at the hearing on this Motion.

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14 Dated: January 16, 2025

MALLISON & MARTINEZ

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17 By: 
18 Stan Mallison
19 Hector R. Martinez
20 Dan Keller
21 Attorneys for Plaintiffs
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